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Attorneys for Third-Party 18500 Marshall Ln, LLC

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

In re:

DUTCHINTS DEVELOPMENT LLC;

Debtor.

CASE NO. 21-51255-MEH

Chapter 7

**DECLARATION OF BRANDON P. BROUSSEAU RE: FILING AND SERVICE OF THIRD-PARTY 18500 MARSHALL LN, LLC'S OBJECTION TO TRUSTEE'S MOTION TO APPROVE COMPROMISE**

The Honorable M. Elaine Hammond,  
United States Bankruptcy Judge

I, Brandon P. Brousseau, declare as follows:

1. I submit this declaration in support of Third-party 18500 Marshall Ln, LLC's Objection (the "Objection") to the Motion to Approve Compromise with Owners of 18500 and 18520 Marshall Lane, Saratoga, CA (the "Motion"). Except as otherwise indicated herein, this Declaration is based on my personal knowledge. I am over the age of 18 and mentally competent. If called upon to testify, I would testify competently to the facts set forth in this Declaration.

2. On October 13, 2022, at approximately 7:00 p.m. Pacific Time, on behalf of Third-party 18500 Marshall Ln, LLC ("Marshall LLC"), I filed the Objection, the Declaration of Vahe Tashjian in Support of the Objection, the Evidentiary Objections to Declaration of Kailey Wright filed in Support of the Motion, and a Proposed Order reflecting Marshall LLC's Objection to the

1 Motion (collectively, the “Filings”). I utilized the “Court Document Upload” portal (the “Portal”)  
2 located at: <https://www.canb.uscourts.gov/court-document-upload> to submit the Filings to the  
3 United States Bankruptcy Court Northern District of California San Jose Division. A true and  
4 correct copy of the confirmation email I received from the Court is attached hereto as **Exhibit A**.

5 3. However, due to size limitations, the Portal would not accept the Declaration Vahe  
6 Tashjian in Support of the Objection, inclusive of the exhibits supporting his Declaration. As a  
7 result, I filed only the Declaration without the accompanying exhibits. An Amended Declaration  
8 Vahe Tashjian in Support of the Objection, inclusive of the accompanying exhibits, is being filed  
9 and served concurrently with this Declaration.

10 4. On October 13, 2022, at approximately 7:14 p.m. Pacific Time, in accord with  
11 United States Bankruptcy Court Northern District of California Local Rule 9014-1(B)(3), requiring  
12 service on the initiating party, I served the Filings on Messrs. Michael A. Sweet and Jack Praetzellis,  
13 of Fox Rothschild, LLP, as counsel for the Chapter 7 Trustee Richard Marshack. Service of the  
14 Filings on Messrs. Michael A. Sweet and Jack Praetzellis included all of the supporting exhibits to  
15 the Declaration Vahe Tashjian in Support of the Objection via a Dropbox link. A true and correct  
16 copy of the service email transmission is attached hereto as **Exhibit B**.

17 I declare under the penalty of perjury under the laws of the United States that the foregoing  
18 is true and correct and this declaration was executed on October 19, 2022.

19 \_\_\_\_\_  
20 /s/ *Brandon P. Brousseau*

21 *Brandon P. Brousseau*  
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# **EXHIBIT A**



Brandon Brousseau <brandon@davidovichlaw.com>

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## Your documents have been submitted.

1 message

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**Bankruptcy Court Document Upload Confirmation** <Helpdesk@canb.uscourts.gov>  
To: brandon@davidovichlaw.com

Thu, Oct 13, 2022 at 7:00 PM

Submitted on Thursday, October 13, 2022 - 7:00pm

\*We have received your Document Upload.\*

Thank you,  
U.S. Bankruptcy Court  
Northern District of California

# **EXHIBIT B**



Brandon Brousseau &lt;brandon@davidovichlaw.com&gt;

**In re: Dutchints Development, LLC; United States Bankruptcy Court Northern District of California Case No. 21-51255-MEH**

1 message

**Brandon Brousseau** <brandon@davidovichlaw.com>

Thu, Oct 13, 2022 at 7:14 PM

To: jpraetzellis@foxrothschild.com, msweet@foxrothschild.com

Cc: Niv Davidovich &lt;niv@davidovichlaw.com&gt;

Counsel,

In accord with United States Bankruptcy Court Northern District of California Local Rule 9014-1(B)(3), requiring service on the initiating party, attached are service copies of the following documents for the above-referenced matter:

1. THIRD-PARTY 18500 MARSHALL LN, LLC'S OBJECTION TO TRUSTEE'S MOTION TO APPROVE COMPROMISE AND REQUEST FOR HEARING [Doc #253];
2. DECLARATION OF VAHE TASHJIAN IN SUPPORT OF THIRD-PARTY 18500 MARSHALL LN, LLC'S OBJECTION TO TRUSTEE'S MOTION TO APPROVE COMPROMISE [Doc #253]
3. THIRD-PARTY 18500 MARSHALL LN, LLC'S EVIDENTIARY OBJECTIONS TO DECLARATION OF KAILEY WRIGHT [Doc #256] FILED IN SUPPORT OF TRUSTEE'S MOTION TO APPROVE COMPROMISE [Doc #253]
4. THIRD-PARTY 18500 MARSHALL LN, LLC'S PROPOSED ORDER ON MOTION TO APPROVE COMPROMISE [Doc #253]

Due to size limitations, the Exhibits in support of Mr. Tashjian's Declaration can be downloaded at <https://www.dropbox.com/s/r4mdnw8xi498pu6/Combined%20Exhibits.pdf?dl=0>

If you have any difficulty with the attachments or exhibits, please do not hesitate to contact our office.

With Regards,

Brandon Brousseau, Esq.



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**4 attachments** **18500 Marshall Objection (Evid Obj).pdf**  
299K**Case: 21-51255 Doc# 285 Filed: 11/03/22 Entered: 11/03/22 18:00:04 Page 6 of 7**



**18500 Marshall Objection (Tashjian Dec).pdf**

146K



**18500 Marshall Objection (PA).pdf**

397K



**18500 Marshall Objection (Order).pdf**

229K